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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 TRINA PARKER, as an individual;
9 Plaintiff,
10 v.

11 DIGNITY HEALTH dba ST ROSE
DOMINICAN HEALTH HOSPITAL-SIENA
12 CAMPUS, as a Corporation;

13 SCOTT R. FERGUSON M.D., as an
14 individual;

15 Defendant.
16

CASE NO.2:18-cv-02291-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
TO FILE REPLY IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY
JUDGMENT [ECF NO. 49]**

17 Plaintiff Trina Parker, by and through her undersigned counsel, Defendant Dignity Health
18 dba St. Rose Dominican Health Hospital-Siena Campus (hereafter "Defendant St. Rose"), by and
19 through its undersigned counsel, and Defendant Scott R. Ferguson, by and through his undersigned
20 counsel (hereafter the "Parties"), hereby stipulate and agree to extend Plaintiff's deadline to file
21 her Reply in support of her Motion for Partial Summary Judgment (ECF No. 49) against Defendant
22 St. Rose, as follows:

23 1. On August 29, 2019, Plaintiff filed her Motion for Partial Summary Judgment (ECF
24 No. 49) against Defendant St. Rose.

25 2. On September 11, 2019, Defendant St. Rose filed its Opposition to Plaintiff's
26 Motion for Partial Summary Judgment (ECF No. 52) and Counter-Motion for Partial Summary
27 Judgment (ECF No. 53).
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1 3. On September 11, 2019, Defendant Scott R. Ferguson, M.D. filed his Joinder to
2 Defendant St. Rose's Opposition to Plaintiff's Motion for Partial Summary Judgment (ECF No.
3 55).

4 4 Although the Opposition to Plaintiff's Motion for Partial Summary Judgment (ECF
5 No. 52) and Counter-Motion for Partial Summary Judgment (ECF No. 53) bear separate ECF filing
6 numbers, the documents are identical.

7 5. Pursuant to the Local Rules, the deadline for Plaintiff to file her reply brief in
8 support of her Motion for Partial Summary Judgment (ECF No. 49) is September 25, 2019. (*See*
9 ECF No. 52.)

10 6. Pursuant to the Local Rules, the deadline for Plaintiff to file her response to
11 Defendant St. Rose's Counter-Motion for Partial Summary Judgment (ECF No. 53) is October 2,
12 2019. (*See* ECF No. 53.)

13 7. The Parties agree Plaintiff's deadline to file her reply brief in support of her Motion
14 for Partial Summary Judgment (ECF No. 49) should be extended until October 2, 2019, as the
15 issues in Defendant St. Rose's Opposition (ECF No. 52) and its Counter-Motion for Partial
16 Summary Judgment (ECF No. 53) are the same and merit additional time for Plaintiff to respond
17 to.
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19 This extension will not interfere with the Court's scheduling order or the briefing schedule
20 of any other pending motion. Accordingly, the Parties respectfully request that the Court extend
21 Plaintiff's deadline to file her reply in support of her Motion for Partial Summary Judgment (ECF
22 No.49) until October 2, 2019.

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1 The parties submit this stipulation in good faith, and not for purposes of undue delay.

2 **IT IS SO STIPULATED.**

3 DATED this 26th day of September, 2019.

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5 **BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC**

6 /s/ Brandon L. Phillips
7 BRANDON L. PHILLIPS, ESQ.
8 Nevada Bar No. 12264
9 1455 E. Tropicana Avenue, Ste. 750
10 Las Vegas, NV 89119
11 702-795-0097/702-795-0098-fax
12 *Attorney for Plaintiff*

13 DATED this 26th day of September, 2019.

14 **HALL, PRANGLE & SCHOONVELD, LLC**

15 /s/ Tyson J. Dobbs
16 TYSON J. DOBBS, ESQ.
17 Nevada Bar No.: 11953
18 ZACHARY J. THOMPSON
19 Nevada Bar No.: 11001
20 HALL PRANGLE & SCHOONVELD, LLC
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25 *Attorneys for Defendant*
26 *Dignity Health d/b/a St. Rose*
27 *Dominican Hospital - Siena Campus*
28

1 DATED this 26th day of September, 2019.

2 LEWIS BRISBOIS BISGAARD & SMITH

3
4 /s/ Alissa N. Bestick

5 KEITH WEAVER

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15 *Attorneys for Defendant Scott R. Ferguson, M.D.*

16
17 **IT IS SO ORDERED,**

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19 

20 RICHARD F. BOULWARE, II

21 UNITED STATES DISTRICT JUDGE

22 DATED this 1st day of October, 2019.